

**MEMO ENDORSED.**

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June 10, 2025

Application **GRANTED.**

**Via ECF**

**SO ORDERED.**

Honorable Oma T. Wang  
 United States District Court  
 Southern District of New York  
 500 Pearl Street  
 New York, New York 10007

**Ona T. Wang**  
**U.S.M.J. 6/11/2025**

Re: Wickland v. The City of New York, et al.  
 Case: 22-cv-01554 (RA)(OTW)  
 LBBS File No.: 55028.14

Dear Magistrate Judge Wang:

We represent New York City Health and Hospitals Corporation, Dr. Poulakos, Dr. Hajain, Dr. Johnston-Rodriguez, Dr. Eckroth and Dr. Gala (the “NYCHHC defendants”) in this matter and write on behalf of the parties jointly requesting a final eight-day enlargement of time in which to move for summary judgment from June 12 to June 20, 2025. This Court previously extended the time to move on three occasions for various reasons.

The parties are all well into drafting their motions. However, we are engaged in attempts to coordinate the joint filing of common exhibits since they include a nearly 1000-page medical record and 20 transcripts. To that end, we also seek the court’s permission to have one party upload all common exhibits to be referenced by all parties.

We therefore respectfully request that the Court extend the parties’ time to move for summary judgment one final time by one week to June 20, 2025, and grant leave to have the parties reference a single uploaded set of common exhibits.

Respectfully,

Eldar Mayouhas of  
 LEWIS BRISBOIS BISGAARD &  
 SMITH LLP